

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EQUAL EMPLOYMENT OPPORTUNITY : ELECTRONICALLY FILED
COMMISSION, : Case No.: 07-CV-8383 (LAP)
 : (HP)
 :
Plaintiff, : ECF ACTION
 :
-against- :
 :
BLOOMBERG L.P., : BLOOMBERG L.P.'S
 : ANSWER TO EEOC'S
 : AMENDED COMPLAINT
 :
Defendant. :
 :
 :
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JILL PATRICOT, TANYS LANCASTER,
JANET LOURES, and MONICA PRESTIA :
 :
 :
Plaintiffs- Intervenors, :
 :
-against- :
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BLOOMBERG L.P., :
 :
 :
Defendant. :
 :
 :
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Defendant Bloomberg L.P. ("Bloomberg"), by and through its undersigned
counsel, Willkie Farr & Gallagher LLP, hereby answers the amended complaint (the "Amended
Complaint") filed by Plaintiff Equal Employment Opportunity Commission (the "Commission")
as follows:

AS TO ALLEGATIONS CONCERNING "JURISDICTION AND VENUE"

1. Bloomberg respectfully submits that Paragraph 1 of the Amended
Amended Complaint states a legal conclusion as to which no response is necessary.

2. Bloomberg denies the allegations contained in paragraph 2 of the Amended Complaint.

AS TO ALLEGATIONS CONCERNING "PARTIES"

3. Bloomberg respectfully submits that Paragraph 3 of the Amended Complaint states a legal conclusion as to which no response is necessary.

4. Bloomberg admits the allegations contained in paragraph 4 of the Amended Complaint.

5. Bloomberg admits the allegations contained in paragraph 5 of the Amended Complaint.

AS TO THE ALLEGATIONS CONCERNING "STATEMENT OF CLAIMS"

6. Bloomberg admits the allegations in the first sentence of paragraph 6 of the Amended Complaint but denies the allegations in the second sentence of paragraph 6 of the Amended Complaint.

7. Bloomberg denies all allegations in paragraph 7 of the Amended Complaint, including the allegations contained in subparagraphs 7(a)-(e), and specifically denies the existence of a pattern or practice of unlawful employment practices.

8. Bloomberg denies the allegations contained in paragraph 8 of the Amended Complaint.

9. Bloomberg denies the allegations contained in paragraph 9 of the Amended Complaint.

10. Bloomberg denies the allegations contained in paragraph 10 of the Amended Complaint.


AFFIRMATIVE DEFENSES

1. The Amended Complaint fails to state a claim upon which an award of punitive damages may be granted.
2. The Commission failed adequately to exhaust conciliation efforts prior to filing the above-captioned action.
3. The Commission's claims are barred in whole or in part by the applicable statutes of limitation.
4. Bloomberg's employment decisions with respect to non-clerical female employees ("Claimants") were not motivated in whole or in part by gender or status as a pregnant person.
5. Bloomberg's employment decisions with respect to Claimants were not motivated in whole or in part as a retaliation for engaging in a protected activity.

WHEREFORE, Bloomberg demands judgment dismissing the Amended Complaint with prejudice and granting to Bloomberg its costs and expenses of this action, including reasonable attorneys' fees and other such and further relief as this Court may deem just and appropriate.

Dated: New York, New York
March 10, 2008

WILLKIE FARR & GALLAGHER LLP

By: 
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- and -

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